

EXHIBIT B

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Sanjeev Lahoti

August 5, 2009

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SEMI-MATERIALS CO., LTD.)
)
Plaintiff,)
)
VS.) Case No. 4:08-cv-00434 JCH
)
MEMC ELECTRONIC MATERIALS,)
INC., and MEMC PASADENA,)
INC.)
)
Defendants.)

ORAL DEPOSITION OF SANJEEV LAHOTI
AUGUST 5, 2009

ORAL DEPOSITION OF SANJEEV LAHOTI, produced as a witness at the instance of the Plaintiff and duly sworn, was taken in the above styled and numbered cause on Wednesday, August 5, 2009, from 9:35 a.m. to 10:11 a.m., before RENE WHITE MOAREFI, CSR, CRR, RPR in and for the State of Texas, reported by machine shorthand, at the offices of Baker & McKenzie, LLP, 711 Louisiana, Suite 3400, Houston, Texas, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record herein.

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1 please.

2 MR. KENT: I'm sorry, what?

3 THE REPORTER: I'm having a little trouble
4 hearing you.

5 MR. KENT: Okay. Mr. Lahoti is going to be
6 invoking his Fifth Amendment rights not to testify today
7 in response to all questions relating to his employment at
8 MEMC as well as his current employment and his employment
9 history. So we -- we've advised Mr. Carver of that.
10 Mr. Lahoti plans to do that.

11 I am a former federal prosecutor. I'm the
12 one handling the matter that creates the need for him to
13 do that, and I'm very confident of the propriety of him
14 doing that.

15 Also, I just want to state for the record
16 that I -- I understand that Mr. Carver has the right to
17 take this deposition. I would question whether or not he
18 could ever possibly use the invocation by Mr. Lahoti of
19 his Fifth Amendment rights as -- against MEMC given the
20 circumstances of the situation and the fact that MEMC is
21 alleged to be a victim in connection with the matter under
22 investigation.

23 So I just want to say that for the record.
24 And, Mr. Carver, you may proceed.

25 MR. CARVER: Thank you.